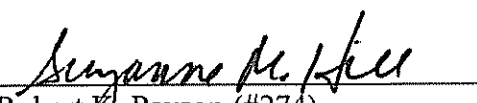


**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Ronald C. Grumbkow,)	
)	
Plaintiff)	
)	
v.)	C.A. No. 06-489 (JJF)
)	
The Walt Disney Company,)	
George J. Mitchell,)	
Chairman of the Board &)	
Robert A. Iger,)	
President/Chief Executive Officer)	
& Jeffrey Ruthizer,)	
Vice-President/ABC Group)	

APPENDIX OF EXHIBITS
IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

POTTER ANDERSON & CORROON LLP

By: 
Robert K. Payson (#274)
Suzanne M. Hill (#4414)
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899
(302) 984-6000

Dated: September 11, 2006

Attorneys for Defendants

INDEX

<u>DESCRIPTION</u>	<u>NO.</u>
<i>Grumbkow v. Bush</i> , C.A. No. 06-1013-RWR (D. Del. June 26, 2006) (order to show cause)	A0001
<i>Grumbkow v. The Walt Disney Company</i> , Misc. No. 02-102-JJF (D. Del. Aug. 23, 2002) (complaint).....	A0003
<i>Grumbkow v. The Walt Disney Company</i> , Misc. No. 02-102-JJF (D. Del. Oct. 9, 2002) (order)	A0006
<i>Grumbkow v. Bush</i> , C.A. No. 06-1013-RWR (D. D.C. May 30, 2006) (complaint)	A0007
<i>Grumbkow v. Bush</i> , C.A. No. 06-1013-RWR (D. D.C. July 31, 2006) (amended complaint)	A0009

- 2 -

answer and an adequate defense, and to determine whether the doctrine of res judicata applies. Brown v. Califano, 75 F.R.D. 497, 498 (D.D.C. 1977). Further, compliance with Rule 8(a)'s requirements should provide a court with sufficient information to determine whether it has jurisdiction over the claims.

As drafted, the complaint does not make clear what claims plaintiff is pursuing against which defendants on what grounds, and it does not provide sufficient notice to the defendants of the claims so that they may prepare a proper defense. In addition, the complaint does not provide sufficient information to determine that jurisdiction exists to hear any of the claims plaintiff intends. Accordingly, it is hereby

ORDERED that on or before July 31, 2006, plaintiff shall file an amended complaint that complies with the requirements of Rule 8, or show cause in writing why this complaint should not be dismissed for failure to comply with Rule 8.

SIGNED this 23rd day of June, 2006.

/s/
RICHARD W. ROBERTS
United States District Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Ronald C. Grumbkow,

Plaintiff

VS.

The Walt Disney Company,

Defendant

Misc.
~~CIVIL~~

ACTION NO. 02-102 JJF

2

COMPLAINT

The Defendant and certain officers, directors and managers of the company have engaged in conduct so defined within the scope of the Racketeer Influenced Corrupt Organization Act which has resulted in the termination of employment from the company of the above named Plaintiff. The company initiated this action in an attempt to cover-up the Plaintiffs allegations of insurance, mail and tax fraud within the ABC Broadcast Division of company. In addition to the termination and through the enormity of the scope of political, economic and communicative prowess possessed by them, Defendants have sucessfully instructed, intimidated and interfered with various federal, state, county and municipal governmental agencies, as well as denying me proper and prudent counsel and subsequent ability for Plaintiff to regain employment. The power and prowess of the Defendant has also manifested itself in forms of coercion and collusion which has in effect barred and blocked the Plaintiff from obtaining and or maintaining any and all future employment opportunities through wrongfully declaring and portraying Plaintiff as a non-worthy employment risk through


the creation of false claims, illegal charges and contrived conclusions, and denying my right to address the stockholders with regard to the illegalities uncovered by the Plaintiff.

As a result of these documented allegations and in recognition of Plaintiffs devoted, diversified and distinguished thirty year career at ABC News, the Plaintiff requests relief in the form of monetary payment in the sum of Forty Four Million Dollars, (\$44,000,000.00), for compensation of damages directly and indirectly associated with the blatant and biased denial of the Plaintiffs guaranteed and undeniable Civil Rights as so declared within the Constitution of the United States of America, as well as all back due denied remuneration and the irreparable damage sustained by Plaintiffs historic and unique Family name.

AS so dated and signed on Twenty First Day of June, Two Thousand and Two.

DATED 6/21/02
Doylestown, Pennsylvania.

SIGNED


Ronald C. Grumbkow, Pro-Se
32 Steeplechase Drive
Doylestown Hunt Estates
Doylestown, Pennsylvania.
18901.

FOR THE DISTRICT OF DELAWARE

Ronald C. Grumbkow,

CIVIL ACTION NO.

Plaintiff

VS

The Walt Disney Company,

Defendant

MOTION TO PROCEED IN FORMA PAUPERIS

I, Ronald C. Grumbkow, declare under penalty of perjury, that I am the Plaintiff in the above-entitled case: that in support of my motion to proceed without being required to pre-pay fees, costs or give security therfor. I declare that because of my poverty I am unable to pay the costs of said proceeding or to give security therfor and that I am entitled to relief.


Signature

32 STEEPLECHASE DRIVE

DOYLESTOWN, PENNSYLVANIA 18901
Address

RONALD C. GRUMBKOW
Print Your Name

SOOS 1 S HUL

5

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RONALD C. GRUMBKOW, :
 :
Plaintiff, :
 :
v. : Miscellaneous Action No. 02-102 JJF
 :
THE WALT DISNEY COMPANY, :
 :
Defendant. :

O R D E R

Presently before the Court in this matter is an Application To Proceed Without Prepayment Of Fees (D.I. 4) filed by Ronald C. Grumbkow.

The Court has reviewed the instant Application and finds that Plaintiff has assets and can pay the fees required to file and pursue this lawsuit, specifically the assets listed in Paragraph 5 of the Application. (The Court notes that Plaintiff has not fully answered the questions in Paragraph 2(b) and 3).

NOW THEREFORE, FOR THE ABOVE REASONS, IT IS HEREBY ORDERED that Plaintiff's Application To Proceed Without Prepayment Of Fees (D.I. 4) is DENIED.

10/9/02

DATE

Joseph D. Tamm

UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Ronald C. Grumbkow
32 Steeplechase Drive
Doylestown Hunt Estates
Doylestown, Pennsylvania.
Tel# 215-230-9179 18901.

PLAINTIFF

CIVIL ACTION NO.

V.

George W. Bush, President
The White House
1600 Pennsylvania Avenue
Washington, D.C. 20500

&
David L. Westin, President
ABC News
1717 DeSales Street, N.W.
Washington, D.C. 20036

&
John Clark, President
NABET-CWA
501 3rd Street, N.W.
Washington, D.C. 20001

DEFENDANTS

CASE NUMBER 1:06CV01013

JUDGE: Richard W. Roberts

DECK TYPE: Civil Rights (non-employment)

DATE STAMP: 5/2/2006

COMPLAINT

On a continuing basis the defendants have engaged in tactics of coercion, collusion and clandestine maneuvers for the purpose of denying the plaintiff all constitutional, contractual and civil rights. These tactics have been utilized because the plaintiff uncovered corporate fraud within the confines of the ABC Network which escalated into The Walt Disney Company and a subsequent coverup because of the involvement of high level authorities within the corporate and union sectors of the company. They then either individually and or collectively utilized the services of controlled associates, advisors and accessories to systematically shut down my finances, first through denial of all employment opportunities and past due remuneration and then using their influence to deny me access to monetary assistance at various banks, most notably but not limited to the following list through subversive acts of crossboarding, the practice of the board of

A0007

one company illegally helping the board member of another.

1. Citigroup.
2. Greenpoint Bank and its successors.
3. Dime Savings Bank and its successors.
4. Farmers and Merchants Bank and its successors.
5. Allfirst Bank and its successors.

In addition it will be proven through the submission of briefs at the appropriate time that in addition to the crossboarding the existance of high level connections with past, present and future public officials, ^{produced} tactics that included acts of incitement, inducement, influence, infringement and intimidation were used on a as necessary basis, resulting in the plaintiff being denied due process pf law at the Federal, State, County and Municipal level within the States of New York, Pennsylvania and Virginia. Within the brief it will further proven that these tactics of protection for abusers of authority through political preponderance, corporate commandeering and union uglifiers. This comparatively small group of abusers have and are through the huge organizations they represent physically, phychologically and physiologically assaulted my Family because of the unique rationale, racial, righteous and religious fabric found therein. Plaintiff hereby seeks as a remedy, a trial by jury and the sum of One Billion Dollars (\$1,-000,000,000,000.00) for compensatory and punitive damages caused by the actions of the defendants. Plaintiff additionally seeks a judicial decree that orders the broadcasting of my plight on all government supervised and licensed television stations so as to illustrate to all viewers the damage a small group of un-American authoritarians can do to a Great Country and a Great Family.

SIGNED

Ronald Curtiss Grumbkow
 Ronald Curtiss Grumbkow
 32 Steeplechase Drive
 Doylestown Hunt Estates
 Doylestown, Pennsylvania.
 18001

Case 1:06-cv-01013-RWR Document 13 Filed 07/31/2006 Page 1 of 6
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Ronald C. Grumbkow
32 Steeplechase Drive
Doylestown Hunt Estates
Doylestown, Pennsylvania.
Tel# 215 230-9179 18901.

RECEIVED

JUL 31 2006

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

PLAINTIFF

V.

CIVIL ACTION No.

George W. Bush, President
The White House
1600 Pennsylvania Avenue
Washington, D.C. 20500

06-1013 (RWR)(D.D.C.)

&
David L. Westin, President
ABC News
1717 DeSales Street, N.W.
Washington, D.C. 20036

&
John Clark, President
NABET-CWA
501 3rd Street, N.W.
Washington, D.C. 20001

DEFENDANTS

AMENDED COMPLAINT

Defendant George W. Bush engaged in collusive, coercive and clandestine maneuvers beginning with his first of many trips to Philadelphia as candidate in August of 2000 and as president in May of this year. Following each visit various federal judicial actions involving the codefendants was either dismissed, disregarded or disallowed. In almost every instance someone received a promotion from each venue, which includes extremely notable judges and at least one cabinet member. These secret sanctions then spread to other federal judicial actions that were pending within New York as well as cascading down to numerous cases within the States of New York and Pennsylvania. I conclude that the defendant engaged in these practices to protect certain corporate and union affiliates that were instrumental in securing his first

and subsequent reelection to office, through the media protection programs developed by his predecessor. Those actions resulted in the denial of due process, right to counsel, illegal search and seizure, equal protection of the law, denial of petition to redress grievances and obstruction of justice, against the plaintiff. Defendant David L. Westin engaged in coercive, collusive and clandestine maneuvers, by refusing to allow the airing of the now fully identified use of insurance, mail and tax fraud by the corporation as exposed by the plaintiff and the subsequent denial of all employment opportunities and due remuneration. All of the subjective and selective refusals to investigate and or air the story in ongoing fashion occurred notwithstanding the status of plaintiff as a documented working press member of ABC News at the time of the initial acts of criminality. The defendant accepted all documentation without question and or response. These actions resulted in an abridging of the freedom of speech, and or of the press against the plaintiff.

Defendant John Clark engaged in coercive, collusive and clandestine maneuvers, by refusing to address the identification of fraudulent activities being directed against plaintiff which included the denial of previous arbitration awards, labor negotiation and contract manipulation to purposely and specifically eliminate only the plaintiff from coverage in an attempt to cover up the already exposed fraud in conjunction with a senior vice-president within the Disney-ABC corporate structure. These actions resulted in the designed and deliberate denial of civil and contractual rights to one employee within a nationally negotiated

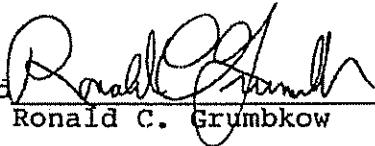
contract and constitute a federal discriminatory action against the plaintiff.

Additionally all of these actions were initiated against the plaintiff by the defendants with prejudicial purpose.

1. The codefendant banks which all advertise on affiliates of ABC News parent company Disney were directed or persuaded to deny me any further credit while previous contract denials had put plaintiff in desperate need of such credit.
2. The defendants carried on and or escalated the damaging of my thirty year plus career at ABC News, which changed dramatically downward following my marriage to an Eurasian woman of Moslem descent, most notably after the first corporate merger in 1985
3. The defendants through the use of threatened political and or media reprisal have in effect denied plaintiff access to and subsequent representation by proper legal counsel.
4. The defendants through the use of political and duopoly party control denied the plaintiff and his family equal access to life, liberty and the pursuit of happiness.

In consideration of the documentable facts contained within this addendum to the original complaint clearly indicates that numerous violations of federal law, including labor racketeering harassment, obstruction of justice and criminal collusion have taken place and the plaintiff is entitled to relief and a demand for judgement for relief is hereby sought. In further consideration of the facts contained herein and in addition to the compensatory and punitive damages as well as the judicial decree stated within the attached primary complaint plaintiff requests

an order of protection and restraint against the named defendants and co-defendants to guard against further tactics of harassment legal or otherwise through the duration of this litigation.

Signed 
Ronald C. Grumbkow

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Ronald C. Grumbkow
32 Steeplechase Drive
Doylestown Hunt Estates
Doylestown, Pennsylvania.
Tel# 215-230-9179 18901.

PLAINTIFF

CIVIL ACTION NO.

V.

George W. Bush, President
The White House
1600 Pennsylvania Avenue
Washington, D.C. 20500
&

David L. Westin, President
ABC News
1717 DeSales Street, N.W.
Washington, D.C. 20036
&

John Clark, President
NABET-CWA
501 3rd Street, N.W.
Washington, D.C. 20001

DEFENDANTS

CASE NUMBER 1:06CV01013

JUDGE: Richard W. Roberts

DECK TYPE: Civil Rights (non-employment)
5 3

DATE STAMP: 8/1/2006

COMPLAINT

On a continuing basis the defendants have engaged in tactics of coercion, collusion and clandestine maneuvers for the purpose of denying the plaintiff all constitutional, contractual and civil rights. These tactics have been utilized because the plaintiff uncovered corporate fraud within the confines of the ABC Network which escalated into The Walt Disney Company and a subsequent coverup because of the involvement of high level authorities within the corporate and union sectors of the company. They then either individually and or collectively utilized the services of controlled associates, advisors and accessories to systematically shut down my finances, first through denial of all employment opportunities and past due remuneration and then using their influence to deny me access to monetary assistance at various banks, most notably but not limited to the following list through subversive acts of crossboarding, the practice of the board of

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3. Dime Savings Bank and its successors.
4. Farmers and Merchants Bank and its successors.
5. Allfirst Bank and its successors.

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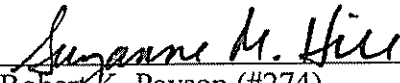
SIGNED Ronald Curtiss Grumbkow
Ronald Curtiss Grumbkow
32 Steeplechase Drive

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Suzanne M. Hill, hereby certify that on September 11, 2006, the attached documents were electronically filed with the United States District Court for the District of Delaware via CM/ECF (official Court electronic filing system) and two (2) true and correct copies were mailed via First Class Mail, Postage Prepaid to the following:

Ronald C. Grumbkow
32 Steeplechase Drive
Doylestown Hunt Estates
Doylestown, PA 18901


Robert K. Payson (#274)
Suzanne M. Hill (#4414)
Hercules Plaza, 6th Floor
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kshannon@potteranderson.com
shill@potteranderson.com